REMARKS

Applicant respectfully requests reconsideration of the subject application in light of the changes above and the arguments that follow. Claims 1-11, 13-23, 25-27, 29-31, 33-38, 40, 41, 43, 45-48, 50-53, 55, 56, 58 and 60-65 are pending. By this Amendment, claims 1, 29, 36, 41, 45 and 55 have been amended.

A.   Rejection Under 35 U.S.C. § 101

The Office Action rejected claims 1-11, 29-31, 36-38, 40-41, 45-48, 55, 56, 58, 60 and 61 under § 101 for allegedly failing to recite patent-eligible subject matter. The Examiner suggested that the rejection may be overcome by amending the claims to recite, "… comprising the following computer-implemented steps."

Independent claims 1, 29, 36, 41, 45 and 55 have been amended as suggested in the Office Action. Applicant, therefore, respectfully submits that claims 1-11, 29-31, 36-38, 40-41, 45-48, 55, 56, 58, 60 and 61 satisfy the requirements of § 101. Reconsideration and withdraw the rejection under § 101 is respectfully requested.

B.   Rejection Under 35 U.S.C. § 102

All the pending claims were rejected under 35 U.S.C. §102(e) as allegedly not being patentable over U.S. Patent No. 5,844,553 to *Hao et al.* ("*Hao*"). In order to properly anticipate Applicant's claims under Section 102(e), each and every element of the claims in issue must be found, either expressly described or under the principles of inherency, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as contained in the claims. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Further, the elements must be arranged as

required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

Applicant respectfully traverses the rejection of claims 1-11, 29-31, 36-38, 40-41, 45-48, 55,

56, 58, 60 and 61 under § 102 because *Hao* is deficient in these regards.

Hao discloses a method for sharing applications between computer workstations by

multicasting input events to application windows. (*Hao*, col. 3, ll. 9-25.) An "Inter-Access

Event Process" (IEP) distributes input events directly from an application window to other

processes that concurrently interact. (*Id.* at col. 5, ll. 52-65.) Upon receiving a button

press/release, a keyboard or a motion event, the IEP multicasts the event to all participating

applications. (*Id.* at col. 8, ll. 4-26.) For example, when a user moves a pointer into a shared

window and performs an action (e.g., motion, button press, key entering, or leaving, the

window), the application sends an input event. The IEP captures the input event, processes it

and then multicast the event to all shared windows.

Claim 1 recites, *inter alia*, "assigning a routing type to an event" and "receiving an

event specifying an assigned routing type." *Hao* appears to be entirely silent with regard to

these claim features. As such, *Hao* cannot support a rejection of claim 1 under § 102.

The Examiner apparently considers *Hao's* events to teach the claimed "routing type."

In particular, the Office Action states, "the routing types of FIG. 3B <u>can be</u> categorized as

broadcast type (i.e., multicast events), focus types (keyboard events), and (geometrical type

(button press/release and mouse click events)". (Office Action, p. 3, ¶ 6, emphasis added.)

Applicant respectfully disagrees.

While the Office Action may have interpreted *Hao's* events to have different

categories, nothing in *Hao* can be considered to describe "<u>assigning</u>" categories to the events.

Indeed, *Hao's* 'Summary of the Invention' section states, "the mechanism <u>only processes</u>

user input events (commands)." (*Hao*, col. 3, ll. 33-36, emphasis added.) Accordingly, there

is no basis to interpret *Hao* to disclose "<u>assigning</u> a routing type to an event" or "specifying

an <u>assigned</u> routing type," as recited in claim 1. (Emphasis added.)

Furthermore, because *Hao* does not disclose "receiving an event <u>specifying an</u>

<u>assigned routing type</u>" the document also cannot disclose "determining a routing mechanism

for the received event <u>based on the specified routing type</u>," as recited in claim 1, for at least

this reason. (Emphasis added.)

Moreover, according to *Hao*, <u>all</u> events occurring in windows of shared applications

are multicast. (*Id.* at col. 8, ll. 4-6.) The determination to multicast a particular event is made

by the IEP <u>based on the shared window</u> in which an event occurred. (*Id.* at col. 8, ll. 51-54.)

Thus, the events in *Hao* cannot be considered to disclose the claimed "determining a routing

mechanism … based on the specified routing type," for this reason as well.

The Office Action points to *Hao's* disclosure of using shared window data arrays for

allegedly determining how a multicast event is shared between applications. (Office Action,

p. 4, ¶ 6.) The window data arrays merely determine which application windows will receive

an event from a shared window based on whether they have been selected by a user. (*Hao*,

FIG. 3A; col. 7, ll. 36-44; col. 9, ll. 23-37.) The determination, however, is not "based on [a]

specified routing type."

Because *Hao* does not disclose the above-noted features of claim 1, *Hao* cannot

support a rejection of claim 1 under § 102. For at least the same reasons, *Hao* fails to

disclose the identical invention in as complete detail as contained in claim 1. Claim 1 is,

therefore, allowable over *Hao*.

Independent claims 13, 25, 29, 33, 36, 41, 43, 45, 50, 55 & 58, although of different

scope than claim 1, recite features similar to the above-noted features of claim 1. Thus, the

purported combination of *Hao* cannot support a rejection of claims 13, 25, 29, 33, 36, 41, 43, 45, 50, 55 & 58 for at least the same reasons given above for claim 1. Claims 13, 25, 29, 33, 36, 41, 43, 45, 50, 55 & 58 are, therefore, allowable as well.

Dependent claims 2-11, 14-23, 26, 27, 30, 31, 34, 35, 37, 38, 40, 46-48, 51-53, 56 & 60-65 are also allowable at least due to their corresponding dependence from claims 1, 13, 25, 29, 33, 36, 41, 43, 45, 50, 55 & 58.

Conclusion

For the reasons set forth above, Applicant respectfully requests allowance of the pending claims.

If additional fees are required for any reason, please charge Deposit Account No. 02-4800 the necessary amount.

Respectfully submitted,

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